

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

January 23, 2024

Nathan Ochsner, Clerk of Court

United States of America

v.

Caleb Pickens

Case No. **4:24-mj-0029***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/11/2024 and 1/23/2024 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

USC 18 1951(a)

Interference with Commerce by Robbery

USC 18 924(c)

Brandishing of a Firearm during a Crime of Violence

USC 18 1951(a)

Interference with Commerce by Robbery

USC 18 1951(a)

Interference with Commerce by Robbery

USC 18 924(c)

Brandishing of a Firearm during a Crime of Violence

This criminal complaint is based on these facts:

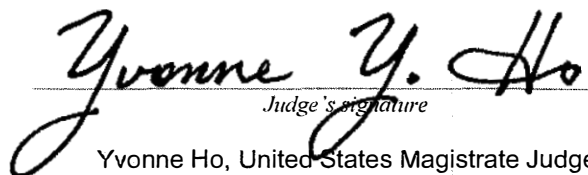
See attached affidavit.

☐ Continued on the attached sheet.*Complainant's signature*

Jessica Bruzas, TFO

Printed name and title

Sworn to by telephone.

Date: 01/23/2024City and state: Houston, Texas*Judge's signature*

Yvonne Ho, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

4:24-mj-0029

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jessica Bruzas, being duly sworn, do hereby depose and state:

1. I am a Detective with the Houston Police Department [HPD], duly appointed according to law and acting as such. I have been a Peace Officer with the HPD for over fourteen [14] years and am assigned to the Houston Police Department's Robbery Division as a member of the FBI Houston Division Violent Crime Task Force [VCTF]. The VCTF is comprised of Task Force Officers [TFO's] from the Houston Police Department, the Harris County Sheriff's Office, and Special Agents of the FBI. The VCTF is responsible for the investigation of, among other violent crimes, bank robbery. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

2. Affiant learned through investigations with the FBI Houston Violent Crime Task Force (VCTF) that Caleb Pickens (PICKENS) was involved in at least three armed robberies that occurred on January 11, 2024 and January 23, 2024 within the Southern District of Texas.

3. Affiant was assigned a serial robbery investigation including at least 16 armed robberies of fast food restaurants and convenience stores – mainly McDonald's restaurants – in Harris County, Texas between the dates of December 30, 2023 and January 23, 2024. The incidents were all linked by suspect description, modus operandi, and vehicle descriptions. Affiant reviewed one of the assigned cases, HPD original offense report number 50141-24, which was written by Officer N. Aslam, a peace officer your Affiant finds credible. The report states that on January 11, 2024, Complainant Reina Rodriguez-Grande (RODRIGUEZ-GRANDE) was working her shift as a manager at the McDonald's restaurant located at 10777 Beechnut St. RODRIGUEZ-GRANDE observed a black male subject, later identified as PICKENS, enter the McDonald's at approximately 0635 hours. She described the subject as a black male between 20-30 yoa, 5'10", slim to average build, wearing black pants and a red hoodie with a white logo on the left side. PICKENS entered the restaurant and immediately jumped the cashier counter and went straight to the back office. PICKENS pointed a pistol at her while asking if she was the manager and demanding she open the safe. In fear for her safety, RODRIGUEZ-GRANDE opened the safe and PICKENS took a bag containing approximately \$700 and then ran out the back door and away on foot. He was observed leaving the area in a black Chevrolet Tahoe parked in an adjacent parking lot. The Tahoe had a broken left rear window, which was covered with a black cloth or tarp. The incident was captured on surveillance cameras. Affiant reviewed a still image from the footage and observed the subject to be a black male wearing a red hoodie with a

white Nike logo on the left breast, black cargo sweatpants, black shoes, and carrying a tan two-tone pistol.

4. Affiant reviewed the next assigned case, HPD original offense report number 50199-24, which was written by Officer M. Hunter, a peace officer your Affiant finds credible. The report states that on January 11, 2024, approximately 25 minutes after the aforementioned robbery, Complainant Josue Bueso-Castro (BUESO-CASTRO) was working his shift at the McDonald's restaurant located at 10638 W Bellfort Ave. BUESO-CASTRO observed a black male subject, later identified as PICKENS, enter the McDonald's at approximately 0700 hours. The subject, again described as a black male between 20-30 yoa, 5'10", average build, wearing black pants and a red hoodie entered the restaurant and immediately jumped over the front counter and walked through the kitchen while asking for the manager and the safe. Once inside the kitchen, PICKENS produced a pistol and fired one shot, which struck a microwave oven. PICKENS then exited out the front door of the restaurant and was observed walking toward the bayou.

5. Officer T. Serrano, assigned to HPD's Westside Divisional Gang Unit, and a peace officer your Affiant finds credible, began in investigate these incidents. After observing the surveillance footage of the Tahoe, Officer Serrano developed a possible suspect vehicle through camera footage and investigative means. He located a black Chevy Tahoe bearing TXLP# 2DV9787 with a broken back window covered with a t-shirt that matched the subject vehicle description.

6. On January 22, 2024, TFO K. Cockrill began conducting surveillance on the Chevrolet Tahoe. He observed a black male wearing a red hoodie with a white Nike logo on the left breast change the license plate on the Tahoe. He observed the plate was changed to a stolen handicapped Texas license plate (1MTNY).

7. On January 23, 2024, TFO K. Cockrill and Officer Serrano, along with other members of their units, continued surveillance on the Tahoe. At approximately 0630 hours, they observed the Tahoe travel to 2424 FM 1960 and park in an adjacent parking lot to the business which contained no other vehicles. This behavior is consistent with the modus operandi (MO) of the other robberies in which the vehicle was parked away from the business and suspect approached on foot to commit the robbery. TFO Cockrill then observed a black male, later identified as PICKENS wearing a dark colored hoodie, reflective vest, and mask on his face exit the Tahoe and walk into the McDonald's. PICKENS immediately jumped over the front counter and entered the kitchen area. This behavior is again consistent with the previously observed MO in the serial robberies. A few minutes later, Officer Serrano observed PICKENS walk from the McDonald's back to the black Chevy Tahoe in the adjacent parking lot and get into the driver's seat. Officers conducted a takedown of the vehicle and Officer Serrano observed PICKENS making furtive movements in the front passenger area of the vehicle before exiting and being taken into custody. During this incident, officers maintained visual contact on the vehicle before entering the parking lot, during the robbery, and following the robbery. PICKENS was found to be the sole occupant of the vehicle.

8. TFO D. Helms went into the McDonald's and spoke with the complainant, who was identified as Laura Reyes (REYES) who he found to be reliable and credible. REYES was working as the manager at the McDonald's during the incident. REYES stated PICKENS entered the restaurant and after jumping the counter, approached her and said "safe." He then displayed a pistol in his pants pocket and forced her into a back room where the safe was located while pressing what REYES believed to be the gun on her back. REYES was in fear for her life and opened the safe. PICKENS stole approximately \$300 dollars in cash and left the location. After PICKENS was detained by officers, a show-up procedure was conducted and REYES positively identified PICKENS as the male who had just robbed her.

9. At the time of PICKENS' arrest, he was in possession of \$695.00. PICKENS was found to be wearing a red hoodie with a white Nike logo on the left breast underneath his black hooded jacket. He was wearing black cargo sweatpants and black/brown sneakers. Affiant noted these clothing items all matched the clothing seen on surveillance from January 11, 2023. Affiant observed PICKENS to be a 24 year old black male, approximately 5'11 and of a slim build. Affiant noted his physical descriptors matched that described by victims and observed on surveillance camera.

10. Officers found the Tahoe to be reported stolen out of Wharton, Texas. PICKENS made a res gestae statement at the time of his arrest that he had taken the vehicle. While conducting an inventory of the vehicle to tow for evidence, Officer Serrano located a two-tone black and tan 9mm Taurus G2 handgun (serial#TKR61948, round in the chamber) underneath the passenger seat consistent with the furtive movements he observed from PICKENS just before he

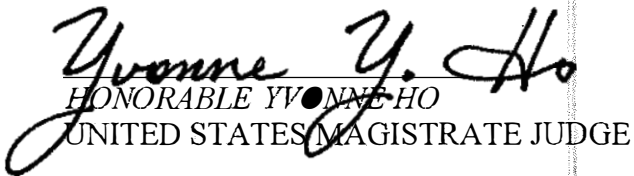
exited the vehicle. This is the same firearm used in the robbery that had just occurred as well as the same firearm Affiant observed on camera footage from the robbery on January 11, 2024.

11. Based on the foregoing, your Affiant believes there is probable cause to believe that on January 11, 2024 and January 23, 2024, Caleb PICKENS interfered with interstate commerce by brandishing a firearm and stealing currency from the McDonald's restaurant located at 10777 Beechnut St, interfered with interstate commerce from the McDonald's restaurant located at 10638 W Bellfort Ave, and interfered with interstate commerce by brandishing a firearm and stealing currency from the McDonald's restaurant located at 2424 FM 1960, all of which are located in the Southern District of Texas, in violation of Title 18, United States Code, Section 1951(a) and 924(c).



TFO Jessica Bruzas, Houston Police Department/ FBI VCTF

Subscribed and Sworn to me by telephone on January 23, 2024, and I find probable cause.



HONORABLE YVONNE HO
UNITED STATES MAGISTRATE JUDGE